

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

_____	)	
DODORA UNIFIED COMMUNICATIONS,	)	
INC.,	)	
Plaintiff,	)	
	)	Civil Action No.
v.	)	05-10016-NMG
	)	
DIRECT INFORMATION PVT. LTD.,	)	
LOGICBOXES, WEBHOSTING. INFO.,	)	
TRANSECUTE (I) PVT. LTD.,	)	
RESELLERSRS, INC., AND	)	
ANSWERABLE, INC., COLLECTIVELY	)	
d/b/a "DIRECTI.COM"	)	
Defendants.	)	
_____	)	

**DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL  
JURISDICTION AND FOR FAILURE TO STATE A CLAIM**

Pursuant to Fed. R. Civ. Pro. 12(b)(2), defendants ResellerSRS, Inc. ("ResellerSRS") and Transecute (I) Pvt. LTD ("Transecute") request that this Court dismiss the claims against them in this action. The defendant Direct Information Pvt. Ltd. ("Directi") also requests, pursuant to Fed. R. Civ. Pro. 12(b)(6), that the Court dismiss the claims against the putative defendants, Logicboxes and Webhosting. Info. These defendants state as follows:

1. The Court lacks personal jurisdiction over ResellerSRS and Transecute due to both parties' lack of contacts with the Commonwealth of Massachusetts. Accordingly, all claims against ResllerSRS and Transecute should be dismissed for lack of jurisdiction.

2. The plaintiff's claims against Webhosting and Logicboxes fail as a matter of law because neither defendant is a true legal entity from which the plaintiff could recover. Each is either a tradename or unincorporated division of Directi. As such, the claims against Webhosting and Logicboxes should be dismissed as a matter of law.

3. These defendants submit, in support of this motion, the accompanying memorandum of law and affidavit of Bhavin Turakhia.

WHEREFORE, the defendants respectfully request that the Court grant the relief sought herein.

DIRECT INFORMATION PVT. LTD.,  
TRANSECUTE (I) PVT. LTD., and  
RESELLERSRS, INC.  
By their attorney,

s/ Dustin F. Hecker

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### **CERTIFICATE OF SERVICE**

I, Dustin F. Hecker, hereby certify that on this 11th day of February, 2005, I caused a copy of the foregoing to be served by mail to David G. Baker, 105 Union Wharf, Boston, MA 02109.

s/ Dustin F. Hecker

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Dustin F. Hecker